

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: BETMGM DATA BREACH  
LITIGATION

Civil Action No. 22-7462-JXN-CLW

**[PROPOSED] ORDER**

This matter having been brought before the Court by application of Gibson, Dunn & Crutcher LLP, counsel for Defendant BetMGM, LLC, for an order permitting Christopher Chorba, Jeremy S. Smith, and Wesley Sze to appear and participate *pro hac vice* in this matter on behalf of Defendant; for good cause shown pursuant to Local Civil Rule 101.1(c) of the United States District Court for the District of New Jersey and the Court having considered the parties' submissions, if any, and good cause having been shown;

IT IS on this \_\_\_\_ day of \_\_\_\_\_, 2023, ORDERED that Christopher Chorba, Jeremy S. Smith, and Wesley Sze of Gibson, Dunn & Crutcher LLP are permitted to appear *pro hac vice* as additional counsel for Defendant BetMGM, LLC in the above-captioned matter, pursuant to Local Civil Rule 101.1(c) of the United States District Court for the District of New Jersey; provided, however, that all pleadings, briefs and other papers filed with or submitted to the Court shall be signed by Stephanie L. Silvano, or by such other member of the bar of this Court who has

or may appear as counsel of record for Defendant, who shall be held responsible for said papers and for the conduct of the case and who shall be present before the Court during all steps of these proceedings, unless expressly excused by the Court, as well as be held responsible for the conduct of the attorneys admitted *pro hac vice* pursuant to this Order; and it is

FURTHER ORDERED that each attorney admitted *pro hac vice* pursuant to this Order shall pay the annual fee to the New Jersey Lawyers Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2 within twenty (20) days from the date of the entry of this Order; and it is

FURTHER ORDERED that each attorney admitted *pro hac vice* pursuant to this Order shall make a payment of \$150.00, payable to the Clerk of the United States District Court, in accordance with Local Civil Rule 101.1(c)(3), within twenty (20) days from the date of the entry of this Order; and it is

FURTHER ORDERED that each attorney admitted *pro hac vice* pursuant to this Order shall be within the disciplinary jurisdiction of this Court, and shall be bound by the Local Civil and Admiralty Rules of the United States District Court for the District of New Jersey, including the provisions of Local Civil Rule 103.1, Judicial Ethics and Professional Responsibility, and Local Civil Rule 104.1, Discipline of Attorneys; and it is

FURTHER ORDERED that each attorney admitted *pro hac vice* pursuant to this Order shall be deemed to have agreed to take no fee in any tort case in excess of the New Jersey State Court Contingency Fee Rule, Rule 1:21-7, as amended; and it is

FURTHER ORDERED that a copy of this Order shall be forwarded by the Clerk to the Treasurer of the New Jersey Lawyers Fund for Client Protection.

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HON. CATHY L. WALDOR  
U.S. MAGISTRATE JUDGE